

PRODUCER ESTABLISHMENT INSPECTION REPORT

Inspection No. 042108184201

Greenleaf, LLC
South Business Highway 71
Pineville, Missouri 64856
EPA Establishment Number: None Issued

April 21, 2008

PERSONS INTERVIEWED AND INDIVIDUAL RESPONSIBILITIES:

On April 21, 2008 I conducted a For-Cause Producer Establishment Inspection at Greenleaf, LLC of Pineville, Missouri. I presented credentials and Notice of Inspection to Mr. Robert Applegarth, Employee. Mr. Applegarth is responsible for marketing and he is the most responsible employee on duty at the firm's Pineville facility on a daily basis. Mr. Applegarth's duties are those of an acting Branch Manager. Credentials were also presented to Mr. Shannon Weathers, President of HAZ-M.E.R.T., Inc. of Rogers, Arkansas. Mr. Weather's firm provides RCRA regulatory consultation services to Greenleaf, LLC.

This inspection was conducted on referral from the U. S. Environmental Protection Agency (EPA). I was accompanied and assisted by Mr. Paul Bailey of the Missouri Department of Agriculture and by Mr. Walter Rochelle of EPA.

HISTORY OF THE FIRM:

Greenleaf, LLC (Greenleaf) is a stand alone limited liability corporation operating under private ownership. The firm operates pesticide production and distribution facilities at Pineville and at Neosho, Missouri. Headquarters of the firm are located in Lowell, Arkansas. Reportedly, Greenleaf was formed by Mr. Tom Smith, Owner in 2007 in Lowell. Pesticide manufacturing and distribution operations were established at Neosho during 2007. Greenleaf was formed as a recycling business to process damaged, stressed and overstocked merchandise, including pesticides returned from Wal-Mart Stores, Inc. (Wal-Mart) lawn and garden centers located throughout the United States to six regional Wal-Mart Return Centers.

The Pineville facility was leased and began operations in January, 2008. Mr. Robert Applegarth was transferred from the firm's Neosho facility to supervise operations at the Pineville site on or about April 1, 2008. The Pineville Greenleaf facility is used as a pesticide warehouse and distribution site, as well as a pesticide production facility.

Greenleaf has no corporate officers. There have been no mergers or acquisitions and there are no related firms. The Pineville facility employs one to three persons on a full time basis, sharing employees with the Neosho location. The firm's legal council is the Klenda, Mitchell, Austerman & Zecher law firm of Wichita, Kansas. The law firm's phone number is (316) 267-0331. The RCRA regulatory consultant is HAZ-M.E.R.T., Inc. of Rogers, Arkansas. Total annual sales and sales of pesticides are unknown to Mr. Applegarth.

GUARANTEES AND LABELING AGREEMENTS:

Reportedly, Greenleaf currently holds 25 EPA pesticide registrations that are registered under EPA's 100% Repack policy. Greenleaf registered pesticides are produced in compliance with the terms of the 100% Repack policy. The policy allows Greenleaf to use particular enduse pesticides that were manufactured by or for other respective registrants as a source of formulated material in whole part for the production of Greenleaf registered pesticides. There are no registration or production agreements with other firms and none are required under EPA's 100% Repack Policy. The following is a list of the firm's registered pesticides, preceded by the EPA registration number of the basic registration used as a 100% repack source product:

Source	Greenleaf Pesticide Trade Names	EPA Reg. No.
538-21	FERTILIZER WITH WEED CONTROL	83893-1
538-282	LAWN FERTILIZER WITH WEED CONTROL	83893-2
432-1212	LAWN INSECT KILLER GRANULES (2% SEVIN)	83893-3
28293-328	LAWN & GARDEN INSECT CONTROL	83893-4
9688-181	LAWN & SOIL INSECT KILLER	83893-5
9688-217	FIRE ANT KILLER & PREVENTER BAIT	83893-6
9688-174	FAST KILL FIRE ANT MOUND DESTROYER	83893-7
53818-18	ST. AUGUSTINE LAWN WEED & FEED	83893-8
432-1209	LAWN & GARDEN 5% DUST	83893-9
432-1210	LAWN & GARDEN 10% DUST	83893-10
279-324	LAWN INSECT CONTROL (Bifenthrin .115%)	83893-11
9494-87	INSECTICIDE GRANULES (Permethrin 0.25%)	83893-12
538-88	LAWN FUNGUS CONTROL	83893-13
432-1339	GRUB KILLER	83893-14
2217-660	WEED & FEED	83893-15
2217-827	WEED & FEED II	83893-16
279-3203	LAWN FERT. W/SUMMER INSECT PROTECTION	83893-17
538-266	GRUB KILLER MAX	83893-18
3125-463	GRUB KILLER II	83893-19
9688-83	LAWN INSECT CONTROL GRANULES	83893-20
28293-323	LAWN INSECT KILLER (.1% Deltamethrin)	83893-21
538-260	FERTILIZER WITH INSECT CONTROL	83893-22

Greenleaf, LLC registered pesticide list continued:

538-202	LAWN FERT. WITH CRABGRASS PREVENTER	83893-23
538-190	LAWN FERT. WITH CRABGRASS PROTECTION	83893-24
538-223	LAWN FERTILIZER WITH MOSS CONTROL	83893-25

All of the firm's registrations are dry granular or dust pesticide formulations. Reportedly, no more than five of the Greenleaf pesticide products have so far been produced at the Pineville facility. Pesticide production at the Pineville facility is limited to repackaging pesticides from the broken and leaking original market containers of home lawn and garden use pesticides once offered for sale at Wal-Mart retail stores. Reportedly, pesticides produced at Pineville derive from stressed and damaged enduse pesticide inventories that had recently been stored at the firm's Neosho site. Pesticides are produced at the Pineville facility only upon receipt of production orders from Greenleaf at Neosho. Finished or repackaged pesticides are distributed in unlabeled one ton capacity bulk supersacks to Greenleaf's Neosho facility for retail sale to enduse customers. The Pineville Greenleaf pesticide production facility is not registered with EPA as a pesticide production establishment.

There are no guarantees given or received.

CONSUMER COMPLAINTS:

No complaint files are maintained.

EXPERIMENTAL USE PERMITS:

None are held by the firm.

MANUFACTURING CODES:

Greenleaf does not utilize a batch or lot coding system to identify pesticides in channels of trade.

STORAGE CONDITIONS:

Greenleaf operates from a large leased warehouse covering an area of approximately 1.12 acres at Pineville. The single story steel frame structure with poured concrete floor is situated on a six acre property. The entire site was formerly operated by Ozark Wood Products of Pineville. The structure is equipped with a charcoal bagging facility. Greenleaf leases only the one large warehouse building at the site. A smaller structure located on the grounds is leased to another unrelated business. The property is located on

the Elk River bottoms adjacent to South Business Highway 71 within the southern city limits of Pineville. The eastern edge of the Greenleaf warehouse is located within about 485 feet of the Elk River. The building is not constructed within secondary containment. No hazardous material spill kits, emergency showers or eye wash stations were found inside the warehouse. No hazardous material placards or pesticide warning signs were posted on the outside of the building.

Pesticides, primarily dry or solid formulations and other non-pesticidal merchandise and materials were stored on pallets and in Gaylord totes throughout the warehouse. An estimated 60% or more of the warehouse floor space was used to store hundreds of pallets and totes. The pallets and totes were stacked two or three pallets high in most areas of the warehouse and up to four high in some places. Many pallets and totes held mixed assortments of different pesticides, as well as pesticides and non-pesticide products. The non-pesticide merchandise was primarily fertilizers, mulch, potting soil and other lawn and garden type items. Mr. Applegarth indicated he did not know how many total pounds of pesticides were stored in the warehouse. He said he did not know the number of pallets and totes or the number of individual containers of pesticides. Mr. Applegarth declined to estimate the amount of pesticides currently stored on the firm's Pineville facility inventory.

Many of the pallets and totes containing pesticide products appeared to have been sorted through. Many pallets and totes contained loose or spilled pesticides covering both the undamaged bags and the broken or compromised containers. Numerous dry pesticide and fertilizer spills were observed on the floor of the warehouse. The warehouse did not appear to have received consistent maintenance and housekeeping.

Pesticide storage conditions found inside the warehouse were objectionable. Storage conditions appeared to be chaotic and disorganized. Inventory control was nonexistent. The large number of pesticide and fertilizer spills left on the warehouse floor attested to the firm's failure to follow good manufacturing practices.

Reportedly, full, fully labeled and undamaged pesticide containers have been removed from many of the pallets and totes for shipment to Greenleaf at Neosho. This process is ongoing. Damaged, broken and spilled pesticide containers remain and are used as a source of repackaged pesticides for sale and distribution as Greenleaf registered pesticides when production orders are received. Empty pesticide containers and empty one ton capacity supersacks were found stored in the warehouse. However, no Greenleaf pesticide labeling was available for use in labeling of the pesticides produced by the firm.

SITE SECURITY:

The entire grounds are surrounded by a simple chain link fence. Access is gained through the front gate. The gate is locked only after normal business hours or when the facility is unattended. There are no burglar alarms or other sophisticated security devices in use.

PROMOTION AND DISTRIBUTION:

Reportedly, the Pineville Greenleaf does not distribute pesticides to consignees. Pesticides are produced only on the orders of the Operations Manager at Neosho Greenleaf, Mr. Ralph Kunz. Finished or repackaged Greenleaf registered pesticides are distributed to the Neosho facility where they are sold to local farmers. Undamaged pesticide containers found in the Pineville inventory are cleaned off and segregated for transfer to Neosho Greenleaf, where they are eventually sold to Overstock Freight of Independence, Missouri. The firm does not use advertising and no salesmen are employed.

DISPOSAL:

Reportedly, spilled pesticides are swept up and disposed of, according to RCRA guidelines. Empty pesticide containers left from the debagging process are disposed of at an area sanitary landfill with other miscellaneous trash.

CHILD RESISTANT PACKAGING:

The firm's pesticides are packaged in large one ton capacity bulk supersacks. The containers are exempt from child resistant packaging requirements.

DISCUSSION WITH MANAGEMENT:

All discussion was held with Mr. Robert Applegarth, Employee. Mr. Shannon Weathers of HAZ-M.E.R.T., Inc. was present during much of the inspection. Mr. Applegarth declined to identify himself as Plant Manager indicating he was only an Employee of the firm, but he agreed he was the most responsible person at the facility on a daily basis. Mr. Applegarth's responsibilities were consistent with those of an acting Plant Manager.

Mr. Applegarth stated that his immediate Supervisor was Mr. Ralph Kunz, Operations Manager at Neosho Greenleaf, where Mr. Applegarth was formerly employed as Plant Manager. He affirmed that Greenleaf, LLC is owned by Mr. Tom Smith of Lowell, Arkansas. According to Mr. Applegarth, the Pineville site does not currently receive mail delivery from the U. S. Postal Service, he does not know the physical address of the site, there is no phone service and the office is not equipped with any business machines or communication devices.

Mr. Applegarth indicated he was transferred from Neosho to Pineville on or about April 1, 2008 and pesticide production activities began at Pineville Greenleaf at about that time. He stated the firm operates no other facilities in Pineville. Mr. Applegarth indicated pesticide inventories were shipped from Greenleaf at Neosho to the Pineville facility to relieve overcrowded storage conditions at Neosho beginning in January, 2008.

and that all of the pesticide inventory stored at Pineville was shipped from Neosho Greenleaf. Mr. Applegarth stated that to the best of his knowledge the Pineville facility does not have an EPA establishment number. When Mr. Applegarth confirmed pesticide have been produced at Pineville he was advised to act immediately to secure an EPA establishment number for the Pineville facility. Mr. Applegarth agreed to do so and he also affirmed that pesticide production at Pineville would be suspended until the EPA establishment number is received from EPA.

According to Mr. Applegarth, the pallets and Gaylord totes stored at Pineville also include mixed pallets holding both pesticides and non-pesticide products. Mr. Applegarth stated that he did not know how many loads of pesticides were delivered to the Pineville site and he did not know the amount of pesticides currently held on inventory. He affirmed that Greenleaf has received permission from Wal-Mart to re-sell full undamaged pesticides in the original market containers of the Wal-Mart vendor. Mr. Applegarth stated that one of the main activities of the Pineville site is to sort through the hundreds of pallets and totes received from Neosho Greenleaf looking for undamaged pesticide containers. He said the undamaged containers are segregated from damaged pesticide containers and other merchandise and the bags are cleaned off and re-stacked on pallets for shipment back to Neosho. Mr. Applegarth said he understood that Greenleaf sells the undamaged pesticides to Overstock Freight of Independence, Missouri. He explained that Overstock Freight is an inventory liquidator. Mr. Applegarth stated that he understood some of the undamaged pesticide containers are sold to retail walk-in customers at the Neosho facility.

Mr. Applegarth described the firm's pesticide production activities. He reported that he typically receives orders for Greenleaf registered pesticides via a phone call from Mr. Kunz. According to Mr. Applegarth, he uses a guide sheet or list of Greenleaf registered pesticides identified by trade name and EPA registration number that lists the corresponding trade name and EPA registration number of the Wal-Mart vendor registered pesticide used as the source for each of Greenleaf's 25 registered pesticides. Mr. Applegarth described the list as a conversion table for the vendor or source pesticides into Greenleaf registered pesticides. He stated that when an order for a specific Greenleaf pesticide is received from Mr. Kunz, Pineville Greenleaf employees search through the pallets and totes looking for broken bags and partial containers of the particular source pesticide, upon which the Greenleaf pesticide is registered under the 100% Repack Policy. Mr. Applegarth stated that only damaged containers of the listed source pesticide are used to produce the Greenleaf registered pesticide. He affirmed that the damaged containers are emptied into a one ton capacity bulk supersack and that one of the empty original market containers or bags is placed into the supersack for identification purposes. Mr. Applegarth stated that Greenleaf pesticide labeling is not placed or displayed on the supersack. He affirmed that no pesticide label or labeling is applied to or displayed on the supersack, but that he lists the EPA registration number of the Greenleaf pesticide product on one of the lifting straps of the supersack before it is shipped to Neosho Greenleaf. Reportedly, no Greenleaf pesticide labeling is available at the Pineville Greenleaf facility. Mr. Applegarth provided me with a copy of the Greenleaf registration conversion list.

Mr. Applegarth stressed that Pineville Greenleaf has only produced or repackaged pesticide/fertilizer products and non-pesticide/fertilizer products and that no insecticide products have been produced. He stated that only five or so different Greenleaf pesticides have been produced at Pineville. Mr. Applegarth reported that he does not know how many pesticide orders or individual pesticide containers or supersacks have been produced at Pineville Greenleaf. He said that no records have been maintained regarding pesticide receipts, inventory, production, distribution or disposal at the Pineville facility. Mr. Applegarth indicated some of these records might be maintained at Neosho Greenleaf. He reiterated that he had no capability to generate or maintain pesticide producer records at Pineville.

No pesticide formulation samples were collected during the inspection. Mr. Applegarth stated that no current inventories of finished Greenleaf registered pesticides that were packaged, labeled and released for shipment were available at the Pineville warehouse. No finished Greenleaf pesticides were found on inventory. Additionally, no Greenleaf pesticide labels were found and no labeling was available for review or collection.

During the inspection of pesticide storage areas in the warehouse I discovered what appeared to be a customer order document or production schedule handwritten on a poster. The two page document was posted in plain view near the pallet scale in an area where Mr. Applegarth indicated pesticides were repackaged. The heading of page one of the document stated, "Week of April 6 – 12" and listed a schedule for Monday through Saturday with the names of several Greenleaf customers. The individual customer orders for pesticide and fertilizers were listed, as well. Mr. Applegarth confirmed that the information listed on the two page poster was a production schedule. He also confirmed that the letters "W & F" signified the words "weed and feed" and pertained to orders of pesticide and fertilizer. Below is a summary of the pesticide orders listed on page one of the poster:

Monday	10 Ton W & F – Lyman & Dale Johnston (checkmark) 10 Ton 13-13-13 – Bob Parmlee / Rick Wall (checkmark) 15 Ton 13-13-13 – Jay Renner (checkmark) 8 Ton W & F – Ray Brattin
Tuesday	Trash Out Wrap Fire-logs for Neosho Overstock Set Up For Efficient Production
Wednesday	Maybe 6 – 9 Nelson Watson
Thursday	Maybe 10 Lyman Johnston
Friday	Maybe 10-20 Rick Wall Maybe More For Renner
Saturday	Maybe 25 High – Perry Williams

Page two of the poster included the heading "This Week!". The following is a summary of the customer order information listed on page two of the document:

	Lyman & Dale Johnston	(checkmark) 10 Ton W & F
	Ken Eddleman	25 Tons W & F
Monday	Bob Parmlee	10 Tons 13-13-13
Saturday	Perry Williams	25 Ton High Nitrate
	Plus Ray Brattin	(checkmark) 8 Ton W & F In Parked Truck
	Plus Assorted Others	
	Friday Load 8 W F On Ray Again	(checkmark) 8 Ton In Truck
Monday	Jay Renner	15 Ton 13-13-13
	Shane	3 W F

Mr. Applegarth stated that sales and distribution records are maintained at the firm's Neosho facility.

According to Mr. Applegarth, he was not sure if all of the customer orders listed on the document had been filled or produced by the Pineville Greenleaf facility. He affirmed that pesticides produced at Pineville were shipped to Neosho for delivery or distribution to customers. Mr. Applegarth denied that bulk pesticides were loaded out on trucks for consignees. He denied that pesticides were distributed direct to customers at Pineville. Several photographs were collected of the poster.

I completed a Books & Records Maintenance form and collected a two page written statement from Mr. Applegarth. I collected digital photographs during the inspection. A Receipt For Samples and a copy of the EPA publication *U.S. EPA Small Business Resources* was issued to Mr. Applegarth.

ATTACHMENTS:

Notice of Inspection signed by Mr. Applegarth
Statement signed by Mr. Applegarth (2)
FTTS Inspection Form
Receipt For Samples signed by Mr. Applegarth
Books & Records Maintenance Form
Greenleaf Registered Pesticide Conversion Sheet
History of Official Sample
Digital Photographs

Digital Image Chain of Custody
Digital Image Description Sheet
Aerial Photo of Pineville Site

Respectfully submitted,

A handwritten signature in black ink, appearing to read "Gary Steiner". The signature is written in a cursive, flowing style with a horizontal line extending from the end.

Gary Steiner
Pesticide Investigator
Missouri Department of Agriculture
April 25, 2008



U. S. ENVIRONMENTAL PROTECTION AGENCY

ADDRESS (EPA Regional Office)

Kansas City, Kansas

NOTICE OF INSPECTION

DATE

April 24, 2002

HOUR

12:48

A.M.
P.M.

NAME OF INDIVIDUAL

Robert Applegarth

TITLE

Employee

FIRM NAME

Greenleaf, LLC

FIRM ADDRESS (Number, Street, City, State and Zip Code)

Bus. Hwy 71 South
Pineville, Missouri 64256

SIGNATURE OF EPA EMPLOYEE

TITLE

Investigator

REASON FOR INSPECTION

- ☒ FOR THE PURPOSE OF INSPECTING AND OBTAINING SAMPLES OF ANY PESTICIDES OR DEVICES PACKAGED, LABELED, AND RELEASED FOR SHIPMENT, AND SAMPLES OF ANY CONTAINERS OR LABELING FOR SUCH PESTICIDES OR DEVICES, IN PLACES WHERE PESTICIDES OR DEVICES ARE HELD FOR DISTRIBUTION OR SALE (Sec. 9 (a) and 12 (a) (2) (B)).
- ☒ FOR THE PURPOSE OF INSPECTING AND OBTAINING COPIES OF THOSE RECORDS SPECIFIED IN SECTION 8 AND 40 CFR PART 169. (Sec. 8 and 12 (a) (2) (B)).

VIOLATION SUSPECTED:

For Cause Producer Establishment Inspection
Suspected Production and Distribution of Unregistered
and Misbranded Pesticides at an unregistered
pesticide production establishment.

Section 8, 9 (a) and 12 (a) (2) (B) of the Federal Insecticide, Fungicide, and Rodenticide Act, as amended (7 U.S.C. 136 et seq.) are quoted on the reverse of this form.



U.S. ENVIRONMENTAL PROTECTION AGENCY

ADDRESS (EPA Regional Office)

RECEIPT FOR SAMPLES

Kansas City, Kansas

DATE

April 21, 2008

NAME OF INDIVIDUAL

Robert Applegate

TITLE

Employee

FIRM NAME

Greenleaf, LLC

ADDRESS (Street, City, State and Zip Code)

Bus. Hwy 71 South
Fineville, Missouri 64756

SAMPLE NUMBERS

042108184201

SAMPLES COLLECTED (Describe fully. List Registration, Lot, Batch, Model, Serial Numbers and other positive identifications.)

The following samples were collected by the U.S. Environmental Protection Agency and receipt is hereby acknowledged pursuant to Section 9.(a) of the Federal Insecticide, Fungicide, and Rodenticide Act, as amended (7 U.S.C. 136 g). This section is quoted on the reverse of this form.

042108184201

Digital Photographs
List of Vendor trade names & EPA Reg. No.'s
Conversion to Greenleaf Trade Names &
EPA Reg. No.'s

ACKNOWLEDGMENT OF PRODUCER/REGISTRANT

The undersigned acknowledges that the samples shown above were obtained from pesticides or devices that were packaged, labeled, and released for shipment.

SIGNATURE (Owner, Operator, or Agent)

Robert Applegate

TITLE (Owner, Operator or Agent)

Employee

☐ DUPLICATE SAMPLES
REQUESTED AND PROVIDED☒ DUPLICATE SAMPLES
NOT REQUESTED

SAMPLES WERE

☐ PURCHASED☒ BORROWED

AMOUNT PAID FOR SAMPLES

\$ N/A

☐ CASH☐ VOUCHER☐ TO BE BILLED

NAME OF COLLECTOR (Print or type)

Gary J. Steiner

TITLE OF COLLECTOR

Investigator

SIGNATURE OF COLLECTOR

Gary J. Steiner



U.S. ENVIRONMENTAL PROTECTION AGENCY

ADDRESS (EPA Regional Office)

RECEIPT FOR SAMPLES

Kansas City, Kansas

DATE

April 21, 2008

NAME OF INDIVIDUAL

Robert Applebaugh

TITLE

Employee

FIRM NAME

Greenleaf, LLC

ADDRESS (Street, City, State and Zip Code)

Bus. Hwy 71 South
Fineville, Missouri 64756

SAMPLE NUMBERS

042108184201

SAMPLES COLLECTED (Describe fully. List Registration, Lot, Batch, Model, Serial Numbers and other positive identifications.)

The following samples were collected by the U.S. Environmental Protection Agency and receipt is hereby acknowledged pursuant to Section 9.(a) of the Federal Insecticide, Fungicide, and Rodenticide Act, as amended (7 U.S.C. 136 g). This section is quoted on the reverse of this form.

042108184201

Digital Photographs
List of Vendor trade names & EPA Reg. No.s
Concession to Greenleaf Trade Names &
EPA Reg. No. 2

ACKNOWLEDGMENT OF PRODUCER/REGISTRANT

The undersigned acknowledges that the samples shown above were obtained from pesticides or devices that were packaged, labeled, and released for shipment.

SIGNATURE (Owner, Operator, or Agent)

Robert Applebaugh

TITLE (Owner, Operator or Agent)

Employee

☐ DUPLICATE SAMPLES
REQUESTED AND PROVIDED☒ DUPLICATE SAMPLES
NOT REQUESTED

SAMPLES WERE

☐ PURCHASED☒ BORROWED

AMOUNT PAID FOR SAMPLES

\$

N/A

☐ CASH☐ VOUCHER☐ TO BE BILLED

NAME OF COLLECTOR (Print or type)

Gary J. Steiner

TITLE OF COLLECTOR

Investigator

SIGNATURE OF COLLECTOR

Gary J. Steiner

BOOKS & RECORDS MAINTENANCE
Producer Establishment Inspection

Establishment: <i>Greenleaf, LLC</i>			Inspection Date: <i>4/21/08</i>		
Address: <i>Bus Hwy 71 South</i> <i>Pineville, Missouri 64856</i>			Inspection Number: <i>042108B4201</i>		
RECORDS/DOCUMENTS		40 CFR	Maintained?		Retention Period
			Yes	No	
1.	Pesticide Production (batch) a. Product name b. EPA Reg. No. or EUP No. c. Amount per batch & batch identification numbers	169.2(a)		<input checked="" type="checkbox"/>	2 years
2.	Device Production a. Brand name b. Quantity produced	169.2(b)	<i>N/A</i>		2 years
3.	Receiving a. Brand name of the pesticide or device, or common or chemical name of active ingredient (A.I.) b. Name & address of shipper c. Name of delivering carrier d. Date received e. Quantities received	169.2(c)		<input checked="" type="checkbox"/>	2 years
4.	Shipping a. Brand name of the pesticide or device, or common or chemical name of A.I. b. Name & address of consignee c. Where the pesticide is produced under an EUP, special exemption or special local need d. Name of originating carrier e. Date shipped or delivered for shipment f. Quantities shipped or delivered for shipment	169.2(d)		<input checked="" type="checkbox"/>	2 years
5.	Inventory a. Types & amounts of pesticides or A.I.s b. Quantities of devices in stock	169.2(e)		<input checked="" type="checkbox"/>	replace by current inventory
6.	Advertising for RUP's Copies of all domestic advertising for RUPs to include any advertising the producer has prepared, including any radio or TV scripts for such products	169.2(f)	<i>N/A</i>		2 years
7.	Guarantee Copies of all guarantees given pursuant §12(a)(2)(C) of the Act	169.2(g)	<i>None</i>		1 year after expiration
8.	Export a. Copies of the specification or directions of the foreign purchaser for production of pesticide, device, or A.I. b. Copies of product labels and labeling c. Copies of signed foreign purchase acknowledgement statements d. Copies of instructions provided to foreign purchasers e. Copies of exporter certification f. Identity of coded research products	169.2(h) 168.75(c)(3) 168.85(a)	<i>N/A</i>		2 years after expiration of contract

(continued on reverse side)

RECORDS/DOCUMENTS	40 CFR	Maintained?		Retention Period
		Yes	No	
9. Disposal a. Method of disposal b. Dates of disposal c. Location of disposal sites d. Types and amounts of pesticides and A.I. disposed of e. Pesticide container statement f. Deviations from normal practice	169.2(i)		✓	20 yrs*
10. Tests on Humans a. Names & addresses of subjects tested b. Dates and types c. Written consent of subjects to test d. Information and instructions given subjects e. Adverse effects	169.2(j)	None		20 yrs*
11. Research Data All raw data, interpretations and evaluations, and reports supporting a product registration or tolerance petition	169.2(k)	N/A		permanent while registration is valid & producer is in business
12. Child Resistant Packaging (registrant) a. Description of packaging b. Certification statements c. Test data verification d. Verification of compatibility & durability of package	157.36	N/A Exempt.		as long as product registration is in effect

* After 3 years may be forwarded to EPA for maintenance

COMMENTS:

No records are maintained by the firm.

Inspector Signature:

Gary Stein

STATEMENT

I, Robert Applegate, under affirmation say:

I am an Employee of Greenleaf, LLC of Pineville, Missouri. I am responsible for Marketing and I am the most responsible employee here on a daily basis. My supervisor is Ralph Kunz, Plant Manager at Greenleaf, LLC of Neosho, Missouri. Tom Smith of Springdale, Arkansas is the owner of Greenleaf, LLC. Greenleaf leased a one story steel frame warehouse building formerly operated by Ozark Wood Products in Pineville. I do not know the physical address of this site. Greenleaf does not operate any other sites in Pineville. Greenleaf began operating the Pineville site about April 1, 2008. I was transferred from Neosho to Pineville at that time.

Greenleaf uses the Pineville location to store mixed pallets of merchandise, including pesticides and other non-pesticide products moved from the Neosho Greenleaf site to relieve overcrowding at Neosho. All of the pesticides stored at Pineville were shipped here from Neosho Greenleaf. Greenleaf can now re-sell undamaged full pesticide containers. One of the activities of the Pineville site is to segregate the undamaged pesticide containers from damaged or partial pesticide containers and other merchandise shipped here on pallets from Neosho. To the best of my knowledge Greenleaf at Neosho sells the full containers, as is to local retail walk-in customers and to Doerstock Freight of Kansas City or Independence, Mo., an inventory liquidator.

When Neosho Greenleaf gets a customer order for bulk pesticides, I receive a phone call from Mr. Kunz. Mr. Kunz's pesticide order specifies the Greenleaf trade name and EPA Reg. No., as well as the specific trade name and EPA Reg. No. of the particular pesticide product used to produce the Greenleaf pesticide. Pineville Greenleaf uses only damaged pesticide containers, including partial containers and leaked containers to fill bulk super sack orders from Mr. Kunz. The damaged containers are dumped into super sacks, the Greenleaf EPA Reg. No. is stenciled on one of the straps on the repackaged super sack and one of the original pesticide containers are placed inside the super sack for identification purposes. A Greenleaf pesticide label is not placed on the repackaged super sack. To the best of my knowledge Greenleaf Pineville Site does not have an EPA Establishment number. I have not maintained any pesticide receiving, production or shipping records.

Signature: Robert Applegate Title: Employee

Date: April 21, 2008

Firm Name: Greenleaf, LLC
Address: Bus. Hwy 71 South
City: Pineville
State: Missouri Zip Code: 64856

Signature of Witness: Gary J. Stein

Printed on Recycled Paper

Stat form 1106

STATEMENT

I, Robert Applegarth, under affirmation say:

I am not certain what Greenleaf registered pesticides the Pineville Greenleaf site has produced, because we didn't keep any records. I have provided Gary Steiner with a list of Walmart Vendor pesticide Manufacturers product trade names and EPA registration number with the corresponding Greenleaf trade name and EPA registration number. I use this list to properly identify which pesticides can be bagged and repackaged into Greenleaf pesticide product streams. Pineville Greenleaf has only produced fertilizer with weed control herbicide and no insecticides. Some of the Walmart pallets received included empty bags.

We will act immediately to contact EPA and secure an EPA Establishment number for our Pineville location, and we will cease pesticide production activity in Pineville until we are legal.

I hereby affirm that the above is true to the best of my knowledge.

Signature: Robert Applegarth Title: Employee

Date: April 21, 2008

Firm Name: Greenleaf, LLC
Address: Bus. Hwy 71 South
City: Pineville
State: Missouri Zip Code: 64856

Signature of Witness: Gary Steiner

042108 0000
4/21/08 675

04/21/08

Orig EPA Reg. No.	Prod Name	GL EPA Reg. No.	Product
2217-660	Miracle Gro (Fall) Lawn Fertilizer + Weed Control	83893-15	Greenleaf Weed & Feed
2217-827	Expert Gardener/Winterizer Weed & Feed	83893-16	Greenleaf Weed & Feed II
279-3203	Turf Builder w Summerguard Insect Control & Lawn Fertilizer	83893-17	Greenleaf Lawn Fertilizer with Summer Insect Protection
279-324	Bug B Gon Max Insect Killer for Lawns	83893-11	Greenleaf Lawn Insect Control (0.115% Bifenthrin)
28293-323	Eliminator Soil & Turf Insect Killer Granules	83893-21	Greenleaf Lawn Insect Killer (0.1% Deltamethrin)
28293-328	Eliminator Fire Ant Killer Plus Granules	83893-4	Greenleaf Lawn & Garden Insect Control (0.25% Permethrin)
3125-463	Advanced Lawn Season Long Grub Control	83893-19	Greenleaf Grub Killer II
432-1209	G Tech Sevin-5 Bug Killer/Eliminator Sevin 5% Dust	83893-9	Greenleaf Lawn & Garden Dust 5%
432-1210	Eliminator Sevin 10% Dust	83893-10	Greenleaf Lawn & Garden 10% Dust
432-1212		83893-3	Greenleaf Lawn Insect Killer Granules
432-1339	grub ex	83893-14	Greenleaf Grub Killer
53818-18	St. Augustine Weed & Feed	83893-8	Greenleaf St. Augustine Lawn Weed & Feed
538-190	Crabgrass Preventer + Lawn Food	83893-24	Greenleaf Lawn Fertilizer with Crabgrass Protection
538-202	Turf Builder w Crabgrass Preventer	83893-23	Greenleaf Lawn Fertilizer with Crabgrass Preventer
538-21	Scotts Winterizer w +2 Weed Control Fall Weed & Feed	83893-1	Greenleaf Fertilizer with Weed Control
538-223	Turf Builder 2 Moss Control	83893-25	Greenleaf Lawn Fertilizer with Moss Control
538-260	Turf Builder Fire Ant Killer	83893-22	Greenleaf Fertilizer with Insect Control
538-266	grub ex	83893-18	Greenleaf Grub Killer Max
538-282	Turf Builder w +2 Weed Control Fall Weed & Feed	83893-2	Greenleaf Fertilizer with Weed Control
538-88	Lawn Fungus Control	83893-13	Greenleaf Lawn Fungus Control
9494-87	Cinch Bug Granules	83893-12	Greenleaf Insecticide Granules (Permethrin .25%)
9688-174	Fire Ant Mound Destroyer	83893-7	Greenleaf Fire Ant Mound Control
9688-181	Triazicide Soil & Turf Insect Killer	83893-5	Greenleaf Lawn & Soil Insect Killer
9688-217	Spectracide Fire Ant Killer & Preventer Bait	83893-6	Greenleaf Fast Fire Ant Killer & Bait
9688-83	multi purpose lawn & garden insect killer/real kill	83893-20	Greenleaf Lawn Insect Control Granules